

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

**ANTHONY GAN, individually, and d/b/a  
EMPIRE LEASING, LLC.**

Plaintiff,

v.

No. 12-CV-89-GKF-TLW

1. **SAFECO INSURANCE;**
2. **SAFECO INSURANCE COMPANY OF  
AMERICA;**
3. **AMERICAN ECONOMY INSURANCE  
COMPANY;**
4. **AMERICA FIRST INSURANCE  
COMPANY;**
5. **LIBERTY MUTUAL GROUP;**
6. **LIBERTY MUTUAL GROUP  
AGENCY MARKETS;**
7. **LIBERTY MUTUAL FIRE INSURANCE  
COMPANY; and**
8. **LIBERTY MUTUAL INSURANCE  
COMPANY.**

Defendants.

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**JOINT STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

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Plaintiff, Anthony Gan, individually, and d/b/a/ as Empire Leasing L.L.C., and Defendants, Safeco Insurance, Safeco Insurance Company of America, American Economy Insurance Company, America First Insurance Company, Liberty Mutual Group, Liberty Mutual Group Agency Markets, Liberty Mutual Fire Insurance Company and Liberty Mutual Insurance Company pursuant to Fed.R.Civ.P. 41(a)(1)(A) hereby stipulate and agree that Plaintiff's claim for relief as asserted in the Complaints and/or Petitions filed as against Safeco Insurance, Safeco Insurance Company of America, American Economy Insurance Company, America First Insurance Company, Liberty Mutual Group, Liberty Mutual Group Agency Markets, Liberty Mutual Fire Insurance

Company and Liberty Mutual Insurance Company, in this cause should be dismissed without prejudice to the filing of any future actions with each party bearing their own costs and attorney's fees.

Dated this 21st day of March 2012.

Respectfully Submitted,

s/ David N. Mayo

Larry A. Tawwater, OBA No. 8852

Darren M. Tawwater, OBA No. 18854

David N. Mayo, OBA No. 21985

**THE TAWWATER LAW FIRM, P.L.L.C.**

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**ATTORNEYS FOR PLAINTIFF**

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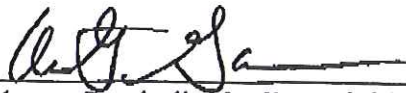
Michael P. Martin, OBA # 22225

**MARTIN, JEAN & JACKSON**

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Stillwater, OK 74076

**ATTORNEY FOR PLAINTIFF**



Anthony Gan individually and d/b/a/ Empire  
Leasing, L.L.C., **PLAINTIFF**

s/Carey C. Calvert (signed with permission)

Bob L. Latham, OBA # 15700

Carey C. Calvert, OBA # 15080

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